



WESTLANDS

SOLAR PARK

DATE: January 11th 2013
TO: CAISO
FROM: Westlands Solar Park
RE: Comments to the CEC/CPUC Workshop on Renewable Resource Portfolios on 12/19/12

Background on Westlands Solar Park (WSP)

The Westlands Solar Park is a 30,000-acre solar industrial park located in the Kings County portion of the Westlands Water District. The solar park is a public-private partnership with Westside Holdings and the Westlands Water District to master plan up to 5,000 MW of large scale solar photovoltaic generation on drainage impaired land under the US Bureau of Reclamation EIS on the San Luis Drainage Feature Re-evaluation. The WSP was identified in the RETI planning process as an environmentally superior competitive renewable energy zone (CREZ).

The WSP team has been actively focused on the master planning efforts for this area for the last three years by managing the permitting work necessary for the development of the solar park as well as actively working with with the agricultural and environmental communities to develop overwhelming support for development of this CREZ.

Summary Comments from the WSP:

- The WSP team is expanding our planning efforts beyond project siting to include a new transmission corridor through the trough of the Westlands Water District beginning at the Westlands Solar Park and potentially connecting to Tesla/Tracy. The addition of the new transmission corridor is important for the WSP and the WWD in order to maximize the renewable generation opportunity throughout the district and we have not seen anything proposed to date from the CAISO to suggest that these plans are already being proposed but rather transmission along these lines is currently only being studied today under “alternative scenarios.”
- Transmission planning for meeting the 33 percent RPS has to incorporate the development of new 500 KV lines in the central valley. These new transmission lines will achieve 3 goals:
 - (1) Improve reliability within the region which will also improve statewide reliability and aid in renewable integration due to the location of WSP renewable energy zone being close to major load and the proximity to a 1,300 MW pump storage facility at Helms
 - (2) Allow for greater utilization of Helms pump storage which will enable lower overall costs for renewable integration and improve the balancing of statewide system costs of renewables for utilities

(3) Enable the full generation capacity of the Westlands drainage impaired lands to meet the current and future RPS goals that is supported by environmental and ratepayer groups throughout the state

- The WSP supports regulators at the CAISO, the CEC and the CPUC approving new 500 KV transmission upgrades in the central valley which will also help to increase the south to north delivery of renewable generation projects in the desert making these upgrades of statewide importance and important to achieve a broad array of goals for the state. While a 500kv project was only mentioned as an alternative in recent 2013-2015 planning windows, it is our view that these upgrades will be inevitable by 2020 for the variety of benefits this transmission will bring to the state and ratepayers and CAISO needs to start planning for this eventuality today and plan with the combined array of goals in mind (policy, reliability and economic viewed simultaneously).

Westlands is a critical area of California for solar development

The Central Valley and specifically the Westlands Solar Park is an important area for renewable energy development due to the proximity to major load centers, the ability to balance variable generation resources like solar and wind throughout the state, the environmental superiority of lands in the WSP zone, the ability to balance variable generation with increased pumping capacity through facilities like Helms, and the expected high line utilization of a new Central Valley/Northern California transmission line as transmission here will meet both reliability and renewable generation delivery for California utilities.

Westlands is a superior alternative to renewable resource areas in the desert

As some renewable projects in the desert get permitted and important species and habitat areas becomes scarce there will be a point where environmentally superior resource areas like Westlands becomes the only large scale master planned solution for California. California's resource planning assumptions need to find a way to hold and develop lands in areas like Westlands where renewable development has a much lower risk profile for development than sensitive areas within the California desert.

Renewable resource assumptions of Westlands are incorrect and fail to recognize the true potential of the region. The CPUC/CEC resource planning assumptions ranging from ~200MWs to up to 1,500MWs for Westlands continue to ignore the importance of the long-term renewable opportunities of the Westland Solar Park and this lack of recognition only continues to delay the inevitable best solution for California to meet it's current and future RPS goals and the transmission needed to help make this resource area spur development more quickly and more economically for ratepayers. Similar to Tehachapi, the Westlands region is capable of being master planned to thousands of megawatts of energy. The WSP can be developed by a variety of commercial solar companies in distinct phases over the coming 7-15 years to benefit from the declining costs of technology and lands in need of a superior alternative use.